

## REMARKS

Claims 1-20 are pending in the present application and stand rejected. Claim 21 has been added. The Examiner's reconsideration is respectfully requested in view of the following remarks.

Claims 1-7, 9-18 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Van De Veen (U.S. Patent No. 5,943,643) (hereinafter "Van De Veen") in view of Dale et al. "Building Applied Natural Language Generation Systems" (EACL-99) (hereinafter "Dale") and in further view of Langkilde et al. "Generation that Exploits Corpus-Based Statistical Knowledge" (hereinafter "Langkilde"). The rejection is respectfully traversed.

The Office Action argues that col. 2, lines 55-58 of Van De Veen teaches or suggest "receiving a concept comprising attributes and corresponding values of each of said attributes from a user," as claimed in claim 1. The recited portion of Van De Veen teaches "a set of signals...produced which is dependent, firstly on the *words* which are input and, secondly, upon the *relationships or links* which may exist between them...[, and] also dependent upon any ambiguities which may arise in the input words." That is, Van De Veen teaches that there is (1) an input of *words*, (2) relationships or links between the input *words*, and (3) ambiguities in the input *words*. It is unclear to Applicant how any of those three teachings involving *input words* even remotely relates to "*attributes and corresponding values of each of said attributes*," as claimed in claim 1.

Applicant respectfully notes that the claims must *not* be viewed in a vacuum; rather, the claims must be viewed in light of the specification. In particular, the instant specification differentiates between "words" and "attributes." (Specification, p. 2, lines 17-19: "Templates comprise *attributes* interspersed between *words* of natural language").

This distinction is also made in claim 2 of the instant application, which separately claims a “word.”

The Office Action cites col. 7, lines 3-10 of Van De Veen when quoting “wherein each phrase fragment includes one of said attributes,” which is claimed in claim 1. The Office Action then states that “a phrase can be made up of a noun, adjective and verb.” However, the Office Action later admits that Van De Veen does not teach the claim limitation, “each phrase fragment includes one of said attributes.” Applicant respectfully requests clarification on this apparent inconsistency. In particular, it is unclear how the citation to col. 7, lines 3-10 of Van De Veen applies to the quoted portion of the claim when the quoted portion of the claim is admittedly not taught by Van De Veen.

Further, the Office Action seems to be saying that the “attributes,” as claimed in claim 1, is taught in Van De Veen as nouns, adjective and verbs. However, such an argument is not mentioned when describing “receiving a concept comprising attributes and corresponding values of each of said attributes from a user,” as claimed in claim 1. Further, the Office Action does not seem to make any distinction between “words” and “attributes” in light of the specification and the claims.

The Office Action admits that Van De Veen and Dale do not teach “receiving a scoring function from the user.” Then, the Office Action inexplicably concludes on page 4 that “since the ‘scoring function’ is described [in the instant specification] as being ‘provided in advance’,” the Office Action reads the term ‘user’ as *necessarily* supplied by the programmer. This is simply an incorrect *conclusory* statement. For example, a user can be a non-programmer who inputs a scoring function prior using the system. Further, such an argument clearly ignores that the *user* also inputs the concept and grammar rules in

two of the steps in the claimed method. It simply is illogical to assume that the *programmer* would input the concept and the grammar rules.

Notwithstanding the above, the Office Action argues that the “statistical extractor” disclosed in Langkilde teaches the “receiving a scoring function from the user,” as taught by claim 1. It is important to note that claim 1 further claims “determining an optimal natural language phrase from the possible natural language phrases *using the scoring function.*” Thus, in order to determine an optimal natural language phrase from possible natural language *phrases*, the “statistical extractor” must input the possible natural language phrases. Langkilde clearly does now show this. Page 705, Figure 1 of Langkilde shows a “statistical extractor” that accepts two inputs: (1) a word lattice of possible renderings, and (2) a corpus. A corpus is simply a collection of words, so this clearly is not “possible natural phrases.” Langkilde defines “word lattice” in column 1 of page 705 as “a state transition *diagram* with links labeled by English *words.*” Nothing in the recited portion of Langkilde teaches or suggests that its “statistical extractor” inputs “*possible natural language phrases,*” as claimed in claim 1. Without such input, it *necessarily* is impossible for the “statistical extractor” to determine “an optimal natural language phrase from the possible natural language phrases.”

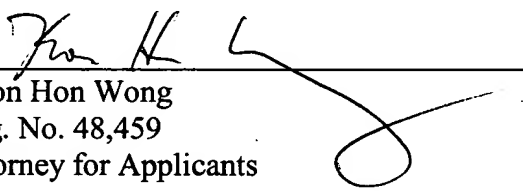
Accordingly, independent claims 1 is believed to be patentably distinguishable over the combination of Van De Veen, Dale and Langkilde. Claims 12 and 21 are believe to be allowable for at least the reasons provided for claim 1. Claims 8 and 19 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Van De Veen, Dale and Langkilde, and further in view of Asahara et al. (17th conference on computational linguistics). Dependent claims 2-11 and 13-20 are believed to be allowable for at least the reasons

given for the independent claims. Withdrawal of the rejection of claims 1-20 under 35 U.S.C. §103(a) is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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